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Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC, and Bernard L. Madoff,

Plaintiff,

v.

KEN-WEN FAMILY LIMITED
PARTNERSHIP; KENNETH W. BROWN, in
his capacity as a General Partner of the Ken-
Wen Family Limited Partnership; and
WENDY BROWN, in her capacity as a
General Partner of the Ken-Wen Family
Limited Partnership,

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04468 (SMB)

Defendants.

STIPULATION FOR EXTENSION OF TIME TO RESPOND

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which defendant Kenneth W. Brown, in his capacity as a General Partner of Ken-Wen Family Limited Partnership (the “Defendant”), may move, answer, or otherwise respond to the first amended complaint (the “First Amended Complaint”) filed in the above-captioned adversary proceeding (Adv. Pro. No. 10-04468 (SMB)) (the “Adversary Proceeding”) is extended up to and including March 12, 2018.

The purpose of this stipulated extension is to provide additional time for the Defendant to answer, move against, or otherwise respond to the First Amended Complaint. This is the first such extension with regards to the First Amended Complaint. Nothing in this stipulation is a waiver of the Defendant’s right to request from the Court a further extension of time to answer, move, or otherwise respond and/or the Trustee’s right to object to any such request.

The parties to this Stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Dkt. No. 16718) in the above-captioned case (Adv. Pro. No. 08-01789 (SMB)).

Dated: February 20, 2018

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

BANKRUPTCY LAW OFFICE OF MARK S.
ROHER, P.A.

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